

DRAFT ANALYSIS
ACICS
Meeting Date: 07/2020

Type of Submission:

Other Report

Current Scope of recognition:

The accreditation of private postsecondary institutions offering certificates or diplomas, and postsecondary institutions offering associate, bachelor's, or master's degrees in programs designed to educate students for professional, technical, or occupational careers, including those that offer those programs via distance education.

Criteria: 602.15(a)(1) Staffing/Financial Resources

Narrative:

Please see attached documentation for response.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 RNU letter of withdrawal	Exhibit 1 - RNU Letter of Withdrawal and ACIC S Acknowledgment of Same.pdf		
Exhibit 2 ACICS Member Directory	Exhibit 2 - ACICS Member Directory.pdf		
Exhibit 3 Accreditation Criteria	Exhibit 3 - Accreditation Criteria.pdf		
Exhibit 4 Initial Application	Exhibit 4 - Initial Application.pdf		
Exhibit 5 Initial Grant Team Report	Exhibit 5 - Initial Grant Team Report.pdf		
Exhibit 6 Institutional Response	Exhibit 6 - Institutional Response.pdf		
Exhibit 6A Institutional Response 1st Deferral Redacted	Exhibit 6A - Institutional Response 1st Deferral_Redacted.pdf		
Exhibit 6B Institutional Response 2nd Deferral_Redacted	Exhibit 6B - Institutional Response 2nd Deferral_Redacted.pdf		
Exhibit 7 Initial Grant Deferral Letter	Exhibit 7 - Initial Grant Deferral Letter.pdf		
Exhibit 8 2nd Deferral Letter	Exhibit 8 - 2nd Deferral Letter.pdf		
Exhibit 9 Initial Grant Approval Letter	Exhibit 9 - Initial Grant Approval Letter.pdf		
Exhibit 10 Audited Financial Statements 2017 and 2018	Exhibit 10 - Audited Financial Statements 2017 and 2018.pdf		
Exhibit 11 Annual Financial Reports	Exhibit 11 - Annual Financial Reports.pdf		
Exhibit 12 2018 and 2019 CARs	Exhibit 12 - 2018 and 2019 CARs.pdf		
Exhibit 13 RNU SA Show Cause	Exhibit 13 - RNU SA Show Cause.pdf		
Exhibit 14 CAR revisions RNU	Exhibit 14 - CAR revisions RNU.pdf		
Exhibit 15 Vacate Show Cause RNU	Exhibit 15 - Vacate Show Cause RNU.pdf		
Exhibit 16 Renewal of Accreditation Application	Exhibit 16 - Renewal of Accreditation Application.pdf		
Exhibit 17 RNU Visit Report	Exhibit 17 - RNU Visit Report.pdf		
Exhibit 18A RNU Institutional Response	Exhibit 18A - RNU Institutional Response.pdf		

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Exhibit 18C RNU Institutional Response	Exhibit 18C - RNU Institutional Response.pdf		
Exhibit 19 RNU Show Cause Letter	Exhibit 19 - RNU Show Cause Letter.pdf		
Exhibit 20 Change of Name Application and Approval	Exhibit 20 - Change of Name Application and Approval.pdf		
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Exhibit 24 Chapter 20 Document Retention and Archiving	Exhibit 24 - Chapter 20 Document Retention and Archiving.pdf		
Exhibit 25 Timeline and Documentation	Exhibit 25 - Timeline and Documentation.pdf		
Exhibit 30 Response to ED Inquiry 2242020 re RNU	Response to ED Inquiry 2-24-2020 re RNU.pdf		
Exhibit 31 Response to ED Inquiry 412020 re RNU	Response to ED Inquiry 4-1-2020 re RNU.pdf		

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency has not demonstrated compliance for this section.

Analyst Remarks to Narrative:

Please see attached letter for draft staff analysis of this section.

List of Document(s) Uploaded by Analyst - Narrative

Exhibit Title	File Name
200215 USA Today article	200215 USA Today article.pdf
200224 ACICS Member Directory	200224 ACICS Member Directory.pdf
2020 02 ACICS inquiry	2020 02 ACICS inquiry.pdf
ACICS draft staff analysis RNU inquiry revised 4-30-20	ACICS draft staff analysis RNU inquiry revised 4-30-20.pdf

Criteria: 602.15(a)(2) Competency of Representatives

Narrative:

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200224 ACICS Member Directory	200224 ACICS Member Directory1.pdf
2020 02 ACICS inquiry	2020 02 ACICS inquiry1.pdf
ACICS draft staff analysis RNU inquiry revised 4-30-20	ACICS draft staff analysis RNU inquiry revised 4-30-201.pdf

Criteria: 602.16(a)(1)(ii) Curricula

Narrative:

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2020 02 ACICS inquiry	2020 02 ACICS inquiry2.pdf
ACICS draft staff analysis RNU inquiry revised 4-30-20	ACICS draft staff analysis RNU inquiry revised 4-30-202.pdf

Criteria: 602.16(a)(1)(iii) Faculty

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Exhibit 6A Institutional Response 1st	Exhibit 6A - Institutional Response 1st Defer		

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2020 02 ACICS inquiry	2020 02 ACICS inquiry3.pdf
ACICS draft staff analysis RNU inquiry revised 4-30-20	ACICS draft staff analysis RNU inquiry revised 4-30-203.pdf

Criteria: 602.16(a)(1)(v) Fiscal/Administrative Capacity

Narrative:

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200215 USA Today article	200224 ACICS Member Directory4.pdf
2020 02 ACICS inquiry	2020 02 ACICS inquiry4.pdf
ACICS draft staff analysis RNU inquiry revised 4-30-20	ACICS draft staff analysis RNU inquiry revised 4-30-204.pdf

Criteria: 602.17(c) On Site Review

Narrative:

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Criteria: 602.18(c) Decisions Based on Published Standards

Narrative:

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Criteria: 602.19(b) Monitoring

Narrative:

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3rd Party Written Comments

There are no written comments uploaded for this Agency.

3rd Party Request for Oral Presentation

There are no oral comments uploaded for this Agency.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

April 28, 2020
Revised April 30, 2020

Michelle Edwards, President
Accrediting Council for Independent Colleges and Schools
1350 Eye Street, NW, Suite 560
Washington, DC 20005
Via email: medwards@acics.org

Dear Ms. Edwards:

The purpose of this revised letter is to provide a complete list of the noncompliant criteria cited in my April 28, 2020, letter.

I am writing to inform you of the results of the Office of Postsecondary Education's Accreditation Group's review of the information and documentation provided by the Accrediting Council for Independent Colleges and Schools ("ACICS" or "the agency"), regarding its accreditation of Reagan National University ("RNU"). RNU was formerly known as "Si Tanka University." This letter constitutes the Department staff's written draft analysis pursuant to 34 C.F.R. § 602.33(c) regarding ACICS' compliance with the following criteria: 602.15(a)(1), 602.15(a)(2), 602.16(a)(1)(ii), 602.16(a)(1)(iii), 602.16(a)(1)(v), 602.17(c), 602.18(c), and 602.19(b).

As you know, the U.S. Department of Education's ("Department's") authority over accrediting agencies is through the recognition process, by which the Secretary of Education ("Secretary") reviews and recognizes accrediting agencies for the purposes of the Title IV Federal Student Aid programs or other federal programs. The primary responsibility of the Accreditation Group is to ensure that an accrediting agency acts in accordance with both its own policies and procedures and with the Secretary's Criteria for Recognition ("Criteria").

Background

On February 15, 2020, USA Today published an article alleging, in part, that ACICS accredited an institution, RNU, that was not actually in operation. According to the research conducted by its journalists, USA Today reported that RNU lacks faculty and students and does not have a physical presence. Although ACICS's website stated that RNU had voluntarily withdrawn its accreditation on February 8, 2020, the ACICS member directory continued to indicate that RNU was still accredited on February 20, 2020.

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On February 24, 2020, and pursuant to its authority under 34 C.F.R. § 602.33, the Department sent ACICS a letter requiring it to submit information and documentation regarding its initial and renewal accreditation reviews of RNU (“Review Letter”).

ACICS provided its response to the Review Letter on March 27, 2020, which included a narrative as well as exhibits. The Department requested additional information and documentation on April 1, 2020, and ACICS submitted its response on April 6, 2020. The March 27, 2020, and April 6, 2020 responses by ACICS are hereinafter referred to as the “Review Response.” In the Review Response, ACICS noted that its member directory had been updated to reflect that RNU is no longer accredited.

This draft staff analysis is based on the Department’s review of ACICS’s narrative response and the documents that it submitted in the Review Response.

Required Standards and their Application

Section 602.16(a) of the Criteria requires an agency to “demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits.” Subsection (1) states that an agency meets this requirement if “the agency's accreditation standards effectively address the quality of the institution or program in the following areas,” to include curricula; faculty; and fiscal and administrative capacity. Based on the agency’s review of RNU for accreditation, it is not clear that ACICS has rigorous standards that effectively address the quality of institutions in all required areas.

Curricula

ACICS includes its requirements related to curricula in Title III, Chapters 1-6 of its Accreditation Criteria (publication date: January 17, 2020; Exhibit 3). The agency’s specific guidance related to distance education and other nontraditional education is included in Appendix H of its Accreditation Criteria. The initial resource visit noted that RNU provided courses via distance education (Exhibit 4, pages 15-16), and RNU reported it in its initial and revised Campus Effectiveness Plan (CEP) (Exhibit 4, pages 203 and 338, respectively). For the initial on-site evaluation on February 2 & 3, 2017, the site visitors stated that they did not review RNU for distance education, as “the existing policies, procedures, and operations did not meet *Council* standards with regard to distance education” (Exhibit 5, page 5). During the site visit, RNU decided to not have the distance education reviewed and instead submitted the courses as “online independent study courses.” The site team noted RNU’s delivery of courses as “independent study” to 100% of the students and whether 100% student participation in online independent study could meet ACICS standards (Exhibit 5, pages 37 and 44). The agency’s definition for “independent study” states that such classes “are the exception and not the rule” and “should be limited” (Glossary of the Accreditation Criteria, Exhibit 3, page 81). RNU’s response to the site visit report stated that by the fall 2017 semester “less than 50%” of students will be participating in independent study, the independent study rate would be reduced to “no more than 25% over the next 5 years.” In addition, RNU submitted written learning contracts for

two individual students, which is an ACICS requirement for each independent study but which were not previously provided (Exhibit 6, pages 111-115).

ACICS issued an accreditation action letter on May 7, 2017, (“Initial Action Letter”). The Initial Action Letter failed to address the overall issue with the curricula that RNU originally submitted as distance education, but that was reviewed on-site as “online independent study courses” to 100% of the student body. This failure is significant because such a delivery did not meet the agency’s standards for either delivery method at the time of the site visit. Yet, despite this failure to address a significant deficiency in RNU’s delivery of educational programs, the Initial Action Letter focused on seemingly minor issues, for example, noting “that there were no written learning contracts,” when in fact RNU had submitted two example learning contracts for independent study. In addition, ACICS’s request for a policy update on RNU’s transition to offering regularly scheduled classes and documentation of written learning contracts for students still participating in independent study (Exhibit 7), failed to address the significant problem that online independent study courses were being offered to 100% of the student body at the time of the site visit.

In response to the Initial Action Letter, RNU stated that it did not offer any independent study in the spring or summer of 2017, and provided documentation of its course offering policy and one written learning contract for independent study from winter 2017 (Exhibit 6A, pages 354-360). RNU also submitted a revised catalog which included an “Independent Studies” section. The Department notes that this section does not meet ACICS’s definition that states independent study classes “are the exception and not the rule” and “should be limited” (Exhibit 6A, page 146). Despite the fact that the information submitted was in stark contrast to the information provided by RNU less than four months earlier and did not provide documentation to confirm that RNU was no longer offering courses mainly through independent study, ACICS accepted the response (Exhibit 8). From the materials submitted to the Department by ACICS, the Department is unable to determine that RNU was in compliance with the curricula standards of ACICS, with specific emphasis on the distance education and independent study elements at the time that ACICS nevertheless granted accreditation. ACICS requires institutions to meet all sections of its Accreditation Criteria to be granted accreditation, per Section 2-3-100.

The ACICS team report for the initial visit also stated that the site visitors were unable to “retrieve, view, or assess any instructional materials” and that students “did not have access to or possess course textbooks,” but this deficiency was not listed as a concern by the team which would require a response by RNU (Exhibit 5, pages 39 and 46). The site visitors noted all four bachelor degree programs did not include the minimum credit hour requirements in the areas of concentration (Exhibit 5, pages 40 and 47). In response, RNU stated that its curriculum committee approved the changes necessary for the bachelor degree programs to meet accreditation standards, but provided no documentation of implementation (Exhibit 6, page 419). The Initial Action Letter refers to the insufficient credit issue as a “failure to ensure its [RNU’s] compliance with a fundamental requirement,” and requested additional information and documentation (Exhibit 7). In response, RNU submitted a narrative that there was a misunderstanding as to the course arrangements for the undergraduate program requirements and provided an ‘Academic Credit Analysis’ form for each program, a revised catalog, and two

student transcripts (Exhibit 6A, pages 414-537). Again, ACICS accepted the response, despite the fact that it did not conclusively demonstrate resolution to the credit issue via implementation. Given the many similar concerns noted during the renewal on-site visit, such as credit hours not converted accurately (Exhibit 17, page 25) and the use of outdated learning materials (Exhibit 17, page 27), it is not clear that RNU was in compliance with the curricula standards of ACICS, which is required for accreditation to be granted by the agency and by Section 602.16(a)(1)(ii).

Faculty

ACICS includes its requirements related to faculty in Title III, Chapters 1-6 of its Accreditation Criteria. For the initial on-site evaluation on February 2 & 3, 2017, there were 27 faculty members listed in the catalog (Exhibit 4, pages 430-431), but 22 listed on the 'Faculty and Administrative Staff Summary Form' (Exhibit 4, pages 433-436) and 12 noted on RNU's initial Campus Accountability Report (CAR) (Exhibit 4, page 134). In the visit report, the site visitors noted that the "records" were verified for all faculty members (Exhibit 5, pages 39, 42, 46, and 49). However, the visit report also noted that the records were not accurate, as the physical addresses of five faculty members who were scheduled for residential courses in fall 2017 were outside the geographic area of RNU (Exhibit 5, page 12). Department staff researched the online presence of the 27 faculty members listed in the catalog and could not find any that included prior or current employment by or affiliation with RNU (or Si Tanka University), but many that were long-time faculty members at other institutions of higher education. The site visitors did not state in their report how many faculty members were interviewed or if any faculty members were interviewed in person. Although RNU provided documentation responsive to the accuracy of the faculty records concern to ACICS, it is still not clear that RNU met the agency's faculty standards based on the site visit report given the similar concerns noted during the renewal on-site visit (Exhibit 17, page 31), as required by Section 602.16(a)(1)(iii).

Fiscal and administrative capacity

Regarding fiscal and administrative capacity, the agency includes its requirements in Title III, Chapter 1 of its Accreditation Criteria. ACICS also requires the submission of an "Annual Financial Report" ("AFR") and audited financial statements, per Sections 2-1-802 and 2-1-803 of the agency's Accreditation Criteria.

RNU provided its audited financial statements for its fiscal year ending December 31, 2015 (Exhibit 4, pages 29-40) during the initial application process. Section 2-1-203 of the agency's Accreditation Criteria requires an institution seeking accreditation to submit "audited financial statements certified by an independent certified public accountant for RNU's most recent fiscal year." However, it is not clear that ACICS confirms financial statements are certified by an independent certified public account. ACICS submitted RNU's financial statements, dated December 31, 2015, and for Si Tanka University, in its Review Response (Exhibit 4, pages 29-38). The financial statements – for a South Dakota-based institution – are on the letterhead of "Wang & Associates" which includes an address in Washington, DC. From the Department's research, that accounting firm has no web presence or apparent expertise in the review of financial statements for institutions of higher education.

ACICS provided the audited financial statements for fiscal years 2017 and 2018 (Exhibit 10), and RNU's AFRs for the same years (Exhibit 11). Section 2-1-808 of the agency's Accreditation Criteria describes the agency's financial review of institutions on an annual basis. The annual review appears to be focused on an institution's financial condition and whether an institution's financial condition is weak or deteriorating. Department staff note that the data collected in the AFRs mostly mimicked the information included in the audited financial statements and did not provide any analysis of RNU's investment in education delivery. In addition, some entries simply do not make any sense – for example “Salaries Expense – Indirect Labor and Fringes” is over two and a half times more than “Salaries Expense – Faculty,” with no explanation of the entries.

Based on its review of the financial statement submitted with the Review Response, the Department is unable to determine that ACICS has adopted and implements rigorous standards that effectively address the fiscal and administrative capacity of its institutions as appropriate to the specified scale of operations, including whether it does anything to test or verify any portion of financial statements submitted on behalf of an institution, as required by Section 602.16(a)(1)(v).

On-site Review

Section 602.17 of the Criteria states an agency “must have effective mechanisms for evaluating an institution's or program's compliance with the agency's standards before reaching a decision to accredit or preaccredit the institution or program.” Subsection (c) states that an agency meets this requirement if “the agency demonstrates that it conducts at least one on-site review of the institution or program during which it obtains sufficient information to determine if the institution or program complies with the agency's standards.” Based on the agency's review of RNU, it is not clear that ACICS obtains sufficient information to determine if an institution complies with agency standards.

The agency includes its requirements related to on-site visits in Title II, Chapter 1 of its Accreditation Criteria. RNU's application and the team report from the initial site visit stated that RNU was seeking review of the programs offered online as distance education, as noted above. However, based on the visit report (Exhibit 5, page 3), no distance education specialist was assigned to the site visit team to conduct a review of the distance education.

The team report from the initial site visit stated that there were 50 full-time students enrolled, and that the “call for comments section and student surveys did not indicate any systemic issues with the campus” (Exhibit 5, page 5). The team report provided student survey results for 6 students from the site visit (Exhibit 5, pages 52-53). The site visitors also reported that 54 current and prior student files were reviewed during the site visit, but that none of the files included documentation of required prior education, as all the files included international diplomas that had not been evaluated for validity (Exhibit 5, pages 13-14). The team report noted that no students were in violation of the satisfactory academic progress policy and that no students had withdrawn for the “time period reviewed by the team” (Exhibit 5, pages 19 and 21, respectively). The site visitors reported that there were no student or graduate involvement in the

design of educational programs or oversight of the graduate programs, as required by the agency's standards (Exhibit 5, pages 23, 41 and 48).

The team report for the renewal of accreditation site visit stated that there were 70 full-time students enrolled, and that the "on-site student survey" was "completed by only three students" (Exhibit 17, page 6). The ACICS correspondence confirming the site visit included a notation that "At least 10 percent of students, across all disciplines and day/evening schedules, will be surveyed," which did not appear to occur at RNU (Exhibit 16, page 9). The "RNU Institutional Summary" (Exhibit 6 - Sample PreVisit Training Materials, pages 12-13, of the compliance report submitted to the Department on December 19, 2019) stated that "only one student did the survey" under the Call for Comment Feedback section. The team report also stated that 25 student files were reviewed, but that no students were reported as in negative satisfactory academic progress policy status and that there were no withdrawn students nor any recent withdrawals (Exhibit 16, page 4). The site visitors reported that RNU stated that "there have been no complaints or grievances filed by students or employees" (Exhibit 16, page 12). Even with the small population of RNU, Department staff is unable to determine whether ACICS conducted a comprehensive review of students at RNU based on the questionable information and documentation noted in the initial and renewal site visit reports.

The team report for the initial visit in 2016 to RNU included similar faculty concerns, as noted above, to the renewal visit in 2019, to include the inaccurate listing of faculty (Exhibit 17, page 31); limited number of faculty interviewed – either in person or via telephone (Exhibit 17, pages 36 and 40); and confusion over the chair of the business programs (Exhibit 17, page 40). Therefore, the Department is unable to determine that ACICS conducts an on-site review at which sufficient information related to compliance with agency standards is obtained, as required by Section 602.17(c).

Consistency in Decision-Making

Section 602.18 of the Criteria states an agency "must consistently apply and enforce standards that respect the stated mission of the institution, including religious mission, and that ensure that the education or training offered by an institution or program, including any offered through distance education or correspondence education, is of sufficient quality to achieve its stated objective for the duration of any accreditation or preaccreditation period granted by the agency." Subsection (c) states that an agency meets this requirement if it "bases decisions regarding accreditation and preaccreditation on the agency's published standards." Based on the agency's review of RNU, it is not clear that ACICS consistently applies and enforces standards.

Section 2-1-200 of the agency's Accreditation Criteria states that "the chief on-site administrator of each campus, as well as any other individual whose responsibility is to coordinate the accreditation process" is required to attend an accreditation workshop. The certificate of attendance submitted by RNU with its application for accreditation is for "Ke Cheng" (Exhibit 4, page 285), who is listed as the "business manager" in the initial catalog submitted (Exhibit 4, page 129). In all correspondence and applications to ACICS in the materials provided to the Department, only Harold Harris, president and chief executive officer, or Adam Yang, dean of academic affairs, are listed on behalf of RNU.

Section 2-1-200 of the agency's Accreditation Criteria also states that "ACICS will take into consideration the actions of other recognized accrediting agencies" when considering an institution for initial accreditation. RNU indicated "yes" for the question "Is the institution currently accredited?" on the pre-application self-assessment, but there does not appear to be any follow-up by ACICS on this disclosure (Exhibit 4, page 3).

ACICS issues a show-cause action letter on January 8, 2019, ("SC Action Letter"). The SC Action Letter concluded that RNU had submitted its 2018 Campus Accountability Report (CAR) that reported a campus-level placement rate of 0%, which is below the agency's standard of 60% (Exhibit 13). RNU submitted revisions to the 2018 CAR, which reflected a campus-level placement rate of 65% and program-level placement rates of 50% for the bachelor degree programs in computer science and management information systems (Exhibit 14). ACICS issued an accreditation action letter to vacate the campus-level show-cause directive and place RNU on reporting on May 20, 2019, (Exhibit 15). Appendix L of the agency's Accreditation Criteria include the benchmarks, compliance standards and actions related to student achievement, which states that the compliance standard for a placement rate, campus- or program-level, is 60%. For programs that fail to meet the 60%, the guidance in Appendix L states that those programs that report a placement rate of 50-59.9% would be placed on compliance warning and those 49.9% or below would be placed on show-cause. However, ACICS did not take any action on the two programs that reported a 50% placement rate, even though the agency staff recommended placing the programs on show-cause (Exhibit 14).

Given that ACICS appears to have been inconsistent in its application and enforcement of standards in other areas noted above, to include the agency's use of a site visitor to review distance education or the amount of students surveyed during the on-site review, the Department is unable to determine that ACICS is in compliance with Section 602.18(c).

Monitoring

Section 602.19(b) of the Criteria states an agency "must demonstrate it has, and effectively applies, a set of monitoring and evaluation approaches that enables the agency to identify problems with an institution's or program's continued compliance with agency standards and that takes into account institutional or program strengths and stability. These approaches must include periodic reports, and collection and analysis of key data and indicators, identified by the agency, including, but not limited to, fiscal information and measures of student achievement." Based on the agency's review of RNU, it is not clear that ACICS has a set of effective monitoring and evaluation approaches as required by this section.

Section 2-1-800 of the agency's Accreditation Criteria include the requirements for maintaining accreditation, which includes the submission of "Annual Accountability Reports," "Annual Financial Report," (AFR) and "Compliance Audits and Audited Financial Statements." Section 2-1-801 the agency's Accreditation Criteria on Annual Accountability Reports states "The Annual Accountability Reports must be submitted on Council forms, comply with Council guidelines, and be certified by the chief executive officer of the institution. Data must be submitted separately on the Campus Accountability Report (CAR) for each main campus and for each branch campus." Based on the submission for RNU, it is not clear that any information

other than the CAR is provided for the ‘Annual Accountability Reports’ requirement. The initial CAR submitted by RNU (Exhibit 4, pages 132-151) included far more information and data than the ones submitted in 2018 and 2019 (Exhibit 12). Sections 2-1-808, 2-1-809, and 2-1-810 the agency’s Accreditation Criteria describe the reviews conducted of the required reports, which include financial, student achievement, and student loan cohort default rates, respectively. The review of student loan cohort default rates is not applicable to RNU as it did not participate in any Title IV programs. Based on the documentation submitted to the Department by ACICS, it appears that the CAR and the AFR are the primary monitoring mechanisms and that the data collected and reviewed is limited to student achievement data and financial capacity data, which are insufficient to be effective in monitoring institutions for compliance with the agency’s standards in all other areas.

The team report for the initial visit in 2016 to RNU included similar concerns, as noted above, to the renewal visit in 2019, to include the failure of RNU to provide documentation to demonstrate that the credit hours were converted accurately (Exhibit 17, page 25); learning materials that were unavailable or inadequate (Exhibit 27, page 27); and inaccurate faculty documentation (Exhibit 17, page 31). These concerns are significant; therefore, the Department is unable to determine that ACICS is collecting sufficient information in specific areas to enable the agency to effectively monitor and identify issues with an institution's continued compliance with agency standards, as required by Section 602.19(b).

Administrative capability

Based on the Department’s findings of the agency’s review of RNU for accreditation, ACICS has not demonstrated that it has the administrative capability to carry out its accreditation activities in light of its scope of recognition, as required by Section 602.15. Again, the information and documentation provided by the agency appears to reflect inadequate staffing, and insufficient training of staff, site visitors, members of the decision-making body, and other agency representatives.

Based on the findings of the Department staff in this review of ACICS, the agency is invited to provide information and documentation to address the compliance concerns noted in this letter related to Sections 602.15(a)(1), 602.15(a)(2), 602.16(a)(1)(ii), 602.16(a)(1)(iii), 602.16(a)(1)(v), 602.17(c), 602.18(b), and 602.19(b) with a written response due May 28, 2020, per the process in Section 602.33(c), via the Department’s electronic submission system. If the areas of noncompliance noted in this letter are not addressed, Department staff will propose a recognition recommendation for the agency. The recommendation could be to limit, suspend or terminate the agency’s recognition or to require the submission of a compliance report with continued recognition pending a final decision on compliance, and will finalize the analysis for presentation to the National Advisory Committee on Institutional Quality and Integrity (NACIQI), at a meeting to be designated by the Department, which could be as early as July 2020.

Should you have any questions regarding this issue, please feel free to contact the staff analyst assigned to your agency, Elizabeth Daggett, at 202-453-6190 or via email at elizabeth.daggett@ed.gov. Thank you for addressing this matter.

Sincerely,

Herman Bounds Jr., Ed.S., Director
Accreditation Group